

HZ/RC/TE IHW 32164 IN

Texas Commission on Environmental Quality

Investigation Report

BP CHEMICALS INC

~~AGE~~
UOR C81433 CO

TXD000751172

BP CHEMICALS GREEN LAKE PLANT

RN100210038

Investigation # 253140

Incident #

Investigator: MATT NERREN

Site Classification

LARGE QUANTITY GENERATOR
CONTAINER STORAGE AREA
IHW LANDFILL
COLLECTION CENTER
INJECTION WELL
SUMP
TANK (SURFACE)
WASTE TREATMENT FACILITY

Conducted: 10/22/2003 -- 10/23/2003

SIC Code: 1629

NAIC Code: 325199

Program(s): INDUSTRIAL AND HAZARDOUS WASTE STORAGE
INDUSTRIAL AND HAZARDOUS WASTE GENERATION
INDUSTRIAL AND HAZARDOUS WASTE PROCESSING
INDUSTRIAL AND HAZARDOUS WASTE DISPOSAL
USED OIL

Investigation Type : Compliance Investigation

Location : Hwy 185 6.5 Mi S of, Bloomington
Texas, Port Lavaca, TX

Additional ID(s) : C81433
50143
TXD000751172
32164

Address: 13050 STATE
HIGHWAY 185 N; PORT LAVACA,
TX 77979

Activity Type : IHW CEI TSD - CEI of
Treatment/Storage/Disposal Facility
MSW UOCC/UOFCC - Investigation of
Collection Centers of Used Oil/Used Oil Filters

Principal(s) :

Role	Name
Participated in Investigation	BP CHEMICALS INC
RESPONDENT	BP CHEMICALS INC

Contact(s) :

Role	Title	Name	Phone
Regulated Entity Mail Contact	PLANT MANAGER	MR JOHN HARVEY III	Work (361) 552-8606
Participated in Investigation	HSE DEPARTMENT	MR MARK STONE	Work (361) 552-8252
Regulated Entity Contact	ENVIRONMENTAL MANAGER	MR VAN BOONE	Work (361) 552-7543 x. 642

Other Staff Member(s) :

Role	Name
ASSOCIATE INVESTIGATOR	SUZANNE PARR
SUPERVISOR	SUSAN CLEWIS

Associated Check List

Checklist Name**Unit Name**

IHW INVESTIGATION TYPES FY04	Invest. type
MSW INVESTIGATION TYPES FY04	UO Type
MSW USED OIL HANDLER GENERATORS	UO Handler
IHW CEI GENERAL FACILITY	IHW Gen
IHW PERMIT COMPLIANCE	Permit
IHW PERMITTED CONTAINER STORAGE AREA	Permit CSA
IHW PERMITTED FACILITY GENERAL STANDARDS	Permit Gen Stand
IHW PRE-INVESTIGATION	Pre Invest
IHW SOURCE REDUCTION & WASTE MINIMIZATION	Source Reduct
IHW SOURCE REDUCTION / WASTE MINIMIZATION	Waste min
IHW LAND DISPOSAL RESTRICTIONS FOR GENERAL	LDR
IHW EXISTING TANKS	Tanks
IHW CONTAINER STORAGE AREA	CSA
MSW USED OIL HANDLER GENERAL/PROHIBITION	UO Prohibition

Investigation Comments :**INTRODUCTION**

On October 22 and 23, 2003, a multi-media investigation was conducted at BP Chemicals' Green Lake Facility. The investigation included a review of the hazardous waste management practices for the permitted facility and the municipal solid waste management practices for the company's registered Used Oil/Used Oil Filter Collection Center.

The Green Lake Facility is located in Calhoun County on State Highway 185, six and one-half miles south of Bloomington, Texas. BP representatives, Mr. Van Boone, Health, Safety and Environmental Manager, and Mr. Mark Stone, Environmental Coordinator, participated in this investigation. Ms. Suzanne Parr, Region 14 Environmental Investigator, also participated in this investigation. Mr. Boone was contacted October 8, 2003, to schedule the investigation.

An exit interview was conducted on October 23, 2003. Mr. Boone and Mr. Stone were informed that no violations had been noted. Mr. Harvey, BP Chemical Plant Manager, stopped by but was scheduled for another appointment.

GENERAL FACILITY AND WASTE PROCESS INFORMATION

BP Chemicals Green Lake Plant is an organic chemical manufacturing facility that produces acrylonitrile, acetonitrile and acetone cyanohydrin. The plant also operates a marine shipping and receiving terminal on the Victoria Barge Canal. This site is a permitted treatment storage and disposal facility (TSD) for waste generated on-site (HW Permit No. 50143).

Process wastewater generated at the plant is treated and disposed into one of three permitted on-site injection wells. Solids removed from the wastewater are handled by ONYX Environmental and incinerated in Port Arthur. Initially, BP disposed of the solids in their on-site landfills, however, due to Land Ban Requirements the solid waste is now incinerated. Wastewaters from non-process areas are treated and discharged through TPDES permitted outfalls.

Permitted waste management units evaluated during this investigation included one Container Storage Area (CSA) - NOR No. 017, and two hazardous waste landfills (one active - NOR No. 027 and one closed - NOR No. 004). The active landfill is seldom used due to the advent of Land Ban Requirements. The following active, permit exempt waste management units were also evaluated: six less than 90-day CSA's, 18 less than 90-Day pre-injection tanks, one non-hazardous landfill and four Satellite Accumulation Areas (SAA's).

A call to Mr. Stoeber, TCEQ Central Office, confirms that the facility maintains liability insurance coverage for sudden and non-sudden accidental occurrences, and for closure and post-closure cost estimates in the required amounts. Financial assurance is provided by corporate guarantee. Inflation adjusted amounts for coverage will be due March 3, 2004.

The facility maintains a registered Used Oil and Used Oil Filter Collection Center. In addition to used oil and used oil filters generated within the plant, the service is provided for employees and their families, and residential neighbors living within a one mile radius of the site. Participants are required to fill out a "Recycling Log Sheet" which requires their name, signature, date, quantity of used oil deposited, and the number of used oil filters deposited. This information is then used to prepare the facility's Annual Report to our agency. Safety Kleen Systems, Inc., Corpus Christi, is contracted to remove and transport the used oil from the 6,000 gallon used oil collection tank (see Unit No. 20 in attachment B) and the collected used oil filters.

CONCLUSION

No violations of the hazardous waste management requirements or the used oil management requirements were observed during this investigation. A general compliance letter was transmitted to the facility.

No Violations Associated to this Investigation

Signed

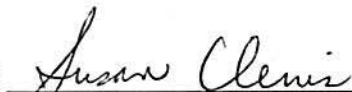


Environmental Investigator

Date

12/08/03

Signed



Supervisor

Date

12/9/03

Attachments: (in order of final report submittal)☐ Enforcement Action Request (EAR)☒ Letter to Facility (specify type): Gen. Com.☐ Investigation Report☐ Sample Analysis Results☐ Manifests☒ NOR - A☒ Maps, Plans, Sketches - B☐ Photographs☐ Correspondence from the facility☒ Other (specify):Tanks Table - CCSA - D

Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Kathleen Hartnett White, *Commissioner*
Margaret Hoffman, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 9, 2003

Mr. John Harvey III
Plant Manager
BP Chemicals Inc.
P.O. Box 659
Port Lavaca, Texas 77979

Re: Compliance Evaluation Investigation at:
BP Chemicals Inc. Green Lake Complex, Highway 185, 6.5 miles South of Bloomington,
Calhoun County, Texas
Solid Waste Registration No. 32164, EPA ID No. TXD000751172
Hazardous Waste Permit No. 50143, Used Oil Handler No. C81433

Dear Mr. Harvey,

On October 22 and 23, 2003, Mr. Matt Nerren and Ms. Suzanne Parr of the Texas Commission on Environmental Quality (TCEQ) Corpus Christi Region 14, Office conducted an investigation of the above referenced facility to evaluate compliance with applicable industrial hazardous waste and used oil requirements. No violations were documented during the investigation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Mr. Matt Nerren in the Corpus Christi Regional Office at (361) 825-3141.

Sincerely,

A handwritten signature in cursive script that reads "Susan Clewis".

Susan Clewis
Waste Section Work Leader
Corpus Christi Regional Office

SC/mn

REPLY TO: REGION 14 • 6300 OCEAN DR., NRC BLDG., STE. 1200 • CORPUS CHRISTI, TEXAS 78412-5503 • 361/825-3100 • FAX 361/825-3101

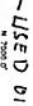
P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: www.tceq.state.tx.us

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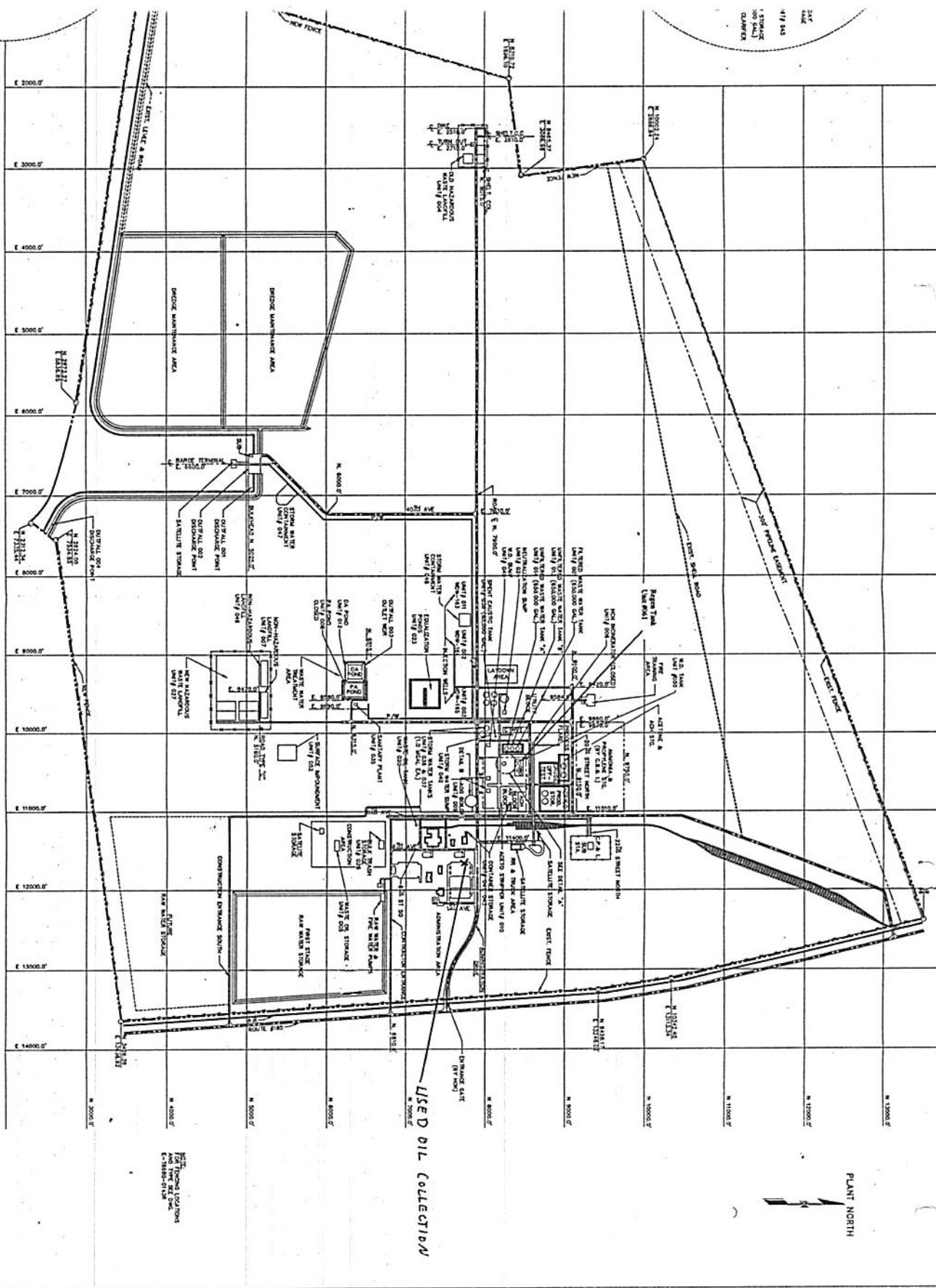
BP Chemicals Inc.

13050 Hwy 185
Port Lavaca, Texas 77979
SW Registration No. 32164
EPA ID No. TXD000751172

Attachment B
Facility Map

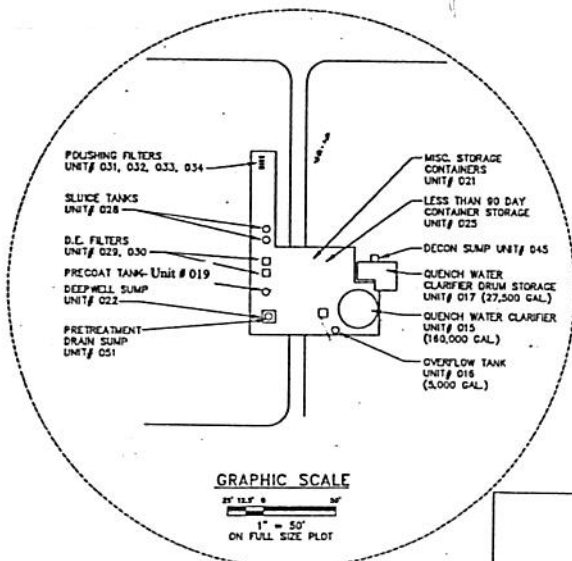
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DATE
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BY
J. J. HARRIS
CHECKED
J. J. HARRIS

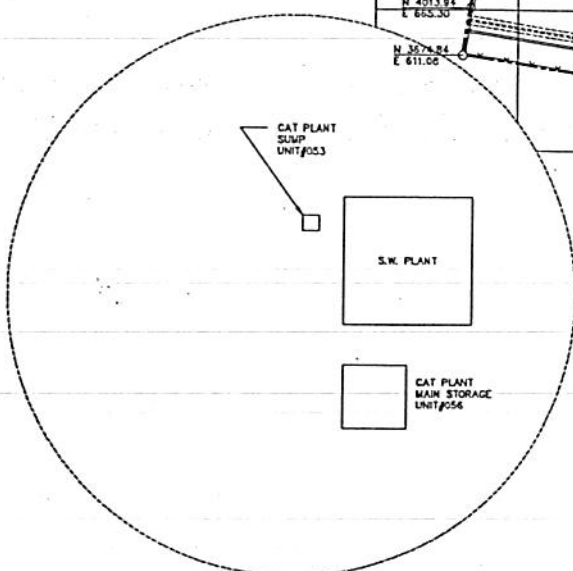
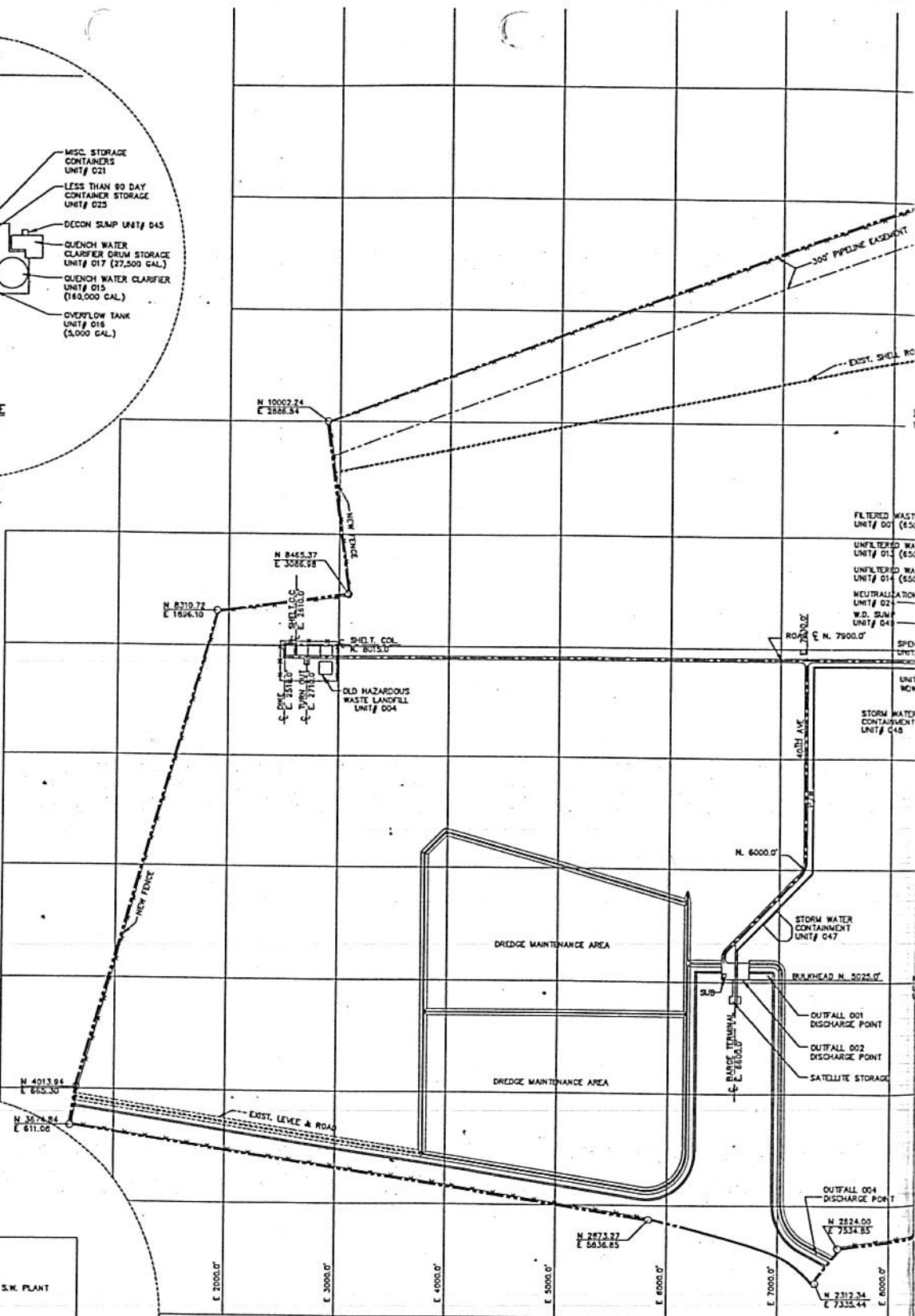


GRAPHIC SCALE
1" = 500'
SEE FILE 875 PLOT

G&W ENGINEERS, INC.	
BR CHEMICALS	
GREEN LAKE PLANT	
OVERALL PLANT PLAN	
GREEN LAKE PLANT CAMBODIA COUNTY	
SHEET NO. 1 OF 1	
E-7750-00103	



DETAIL "A"



DETAIL "B"

BP Chemicals Inc.

13050 Hwy 185
Port Lavaca, Texas 77979
SW Registration No. 32164
EPA ID No. TXD000751172

Attachment C
Tanks Table

BP Chemicals Inc.

Tank Fac Status & Permit #	Tank Capacity (Gallons)	Tank Identity	NOR Facility Number	Location	New (N) or Existing (E) Tank	Date put into Service	Waste Handled (NOR Waste Stream #)
						Date due 2d Cont.	Violation of Rules, list with Section & Q # only
E	3300	Sluice Tanks (2) FD-9101A	028	Deep Well Pretreatment (Two tanks)	E	1980	See NOR
						1995	
E	160,000	Quench Water Clarifier FB-701	015	Deep Well Pretreatment	E	1980	See NOR
						1995	
E	65,000	WW Tank FB-91001C	001	Deep Well Pretreatment	E	1980	See NOR
						1995	
E	650,000	WW Tank Surface FB- 9701A	013	Deep Well Pretreatment	E	1980	See NOR
						1995	
E	650,000	WW Tank (Surface) FB-9701B	014	Deep Well Pretreatment	E	1980	See NOR
						1995	
E	1500	Pre-Coat Tank near D.E. Filters	019	Deep Well Pretreatment	E	1995	See NOR
						1995	
E	1500	Deep Well Sump	022	Deep Well Pretreatment	E	1982	See NOR
						1997	
E	90,000	Deep Well Sump	024	Deep Well Pretreatment	E	1980	See NOR
						1995	
E	1000000	WW Tank	036	Deep Well Pretreatment	E	1984	See NOR
						1999	
E	1000000	WW Tank	037	Deep Well Pretreatment	E	1982	See NOR
						1997	
E	85,000	Spent Caustic Tank FB- 9704	038	Deep Well Pretreatment	E	1980	See NOR
						1995	
E	100000	Deep Well Sump	040	Deep Well Pretreatment	E	1982	See NOR
						1997	
E	27000	Deep Well Sump	049	Deep Well Pretreatment	E	1982	See NOR
						1997	
E	13000	Deep Well Sump	051	Deep Well Pretreatment	E	1982	See NOR
						1997	

				Tanks Table Continued BP Chemicals Inc.			
E	50	Decon Sump	045	Deep Well Pretreatment	E	1995	See NOR
						1995	
E	200	Catalyst Plant Sump	053	Catalyst Plant	E	1999	See NOR
						1999	
E	6000	Clarifier Overflow Tank FB- 9702	016	Deep Well Pretreatment	E	1980	See NOR
						1995	
E	25000	Regen. Collection Tank	61	Deep Well Pretreatment	E	2000	See NOR

NOTE: @ Identify tanks as to Facility status, i.e. P-permitted, I-interim status, E- exempt 90-day storage, S-small quantity generator, and NH-nonhazardous

BP Chemicals Inc.

13050 Hwy 185
Port Lavaca, Texas 77979
SW Registration No. 32164
EPA ID No. TXD000751172

Attachment D
Container Storage Area Table

CONTAINER STORAGE AREAS (CSAs)							
BP Chemical Inc.							
^a NOR Fac. No.	Permit Unit No.	Permit Capacity	Name/ Location	Contai n. Req.?	Wastes Managed (TX. Waste Codes)	Number and Types of Containers Present (at time of INVESTIGATION)	Violation(s) / Area(s) of Concern
005	N/A	N/A	Contractor CSA	No	See NOR	Eight, empty 55 gallon drums	none
017	002	22,000 gals.	Quench water clarifier CSA	Yes	See NOR	No containers present	none
025	N/A	N/A	Polishing unit CSA	No	See NOR	No containers present	none
041	N/A	N/A	Process Lab CSA	No	See NOR	Two 55 gallon drums of lab waste	none
043	N/A	N/A	Main lab CSA	No	See NOR	Two 55 gallon drums of lab waste	none
056	N/A	N/A	Cat plant CSA	No	See NOR	No containers present	none
N/A	N/A	N/A	SAA/ RR & Truck Area	No	N/A	One partially full, 55 gallon drum of contaminated debris	none
N/A	N/A	N/A	SAA/ Construction Area	No	N/A	One partially full, 55 gallon drum of paint waste. HW managed	none
N/A	N/A	N/A	SAA/ Barge Terminal	No	N/A	One partially full, 55 gallon drum of contaminated debris	none
N/A	N/A	N/A	SAA/Rail Rack	No	N/A	One partially full, 55 gallon drum of contaminated debris	none

^a NOR Fac. No.: If registration not required - N/A (i.e., Satellite Accumulation Areas)
If registration required but not provided - X (& note violation of 30 TAC §335.6(c))